

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

THOMAS CIENIEWICZ,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No: 1:22cv172
	:	
GHAFOURPOUR, DDS, ET AL.,	:	
	:	
Defendants.	:	
	:	

ROSEBORO NOTICE

COMES NOW Defendants, Wellpath, LLC, Dr. Alex Taylor, and Dr. Kourosh Ghafourpour, DDS, by counsel. Pursuant to Rule 7(K) of the Local Civil Rules for the United States District Court for the Eastern District of Virginia, the Defendants provide the following information to the *pro se* Plaintiff, Thomas Cieniewicz, with regard to the Defendants' Motion to Dismiss:

1. The *pro se* party is entitled to file a response opposing the motion and any such response must be filed within twenty-one (21) days of the date on which the dispositive or partially dispositive motion is filed; and
2. The Court could dismiss the action on the basis of the moving party's papers if the *pro se* party does not file a response; and
3. The *pro se* party must identify all facts stated by the moving party with which the *pro se* party disagrees and must set forth the *pro se* party's version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and

4. The *pro se* party is also entitled to file a legal brief in opposition to the one filed by the moving party.

Respectfully submitted,

WELLPATH, LLC,
ALEX TAYLOR, MD
And
DR. GHAFOURPOUR, DDS

/s/ Angela Boice Axselle

Joel M. McCray, Esquire (VSB# 38116)
Angela Boice Axselle, Esquire (VSB# 43864)
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CERTIFICATE

I hereby certify that on this 4th day of August, 2022, I filed the foregoing *Notice* electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Jeff W. Rosen, Esquire (VSB # 22689)
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Counsel for Defendant Sgt. David Elliott

And I hereby certify that I have mailed this document by UPS Ground to the following non-filing user:

Thomas Cieniewicz #1191016
HU7 Cell #239B
Greensville Correctional Center
901 Corrections Way
Jarratt, VA 23870
Plaintiff Pro Se

/s/ Angela Boice Axselle

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**Counsel for Defendants Wellpath, LLC,
Alex Taylor, MD and Dr. Ghafourpour, DDS**